

ROPES & GRAY LLP
1211 Avenue of the Americas
New York, NY 10036-8704
Telephone: (212) 596-9000
Facsimile: (212) 596-9090
Gregg M. Galardi
Kimberly J. Kodis
Sam N. Ashuraey

Attorneys for Apex Tool Group, LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
In re	:	Chapter 11
	:	
SEARS HOLDING CORPORATION, et al.,¹	:	Case No. 18-23538 (RDD)
	:	
Debtors.	:	(Jointly Administered)
-----	X	

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Apex Tool Group, LLC ("Apex"), a party in interest in the above-captioned cases, hereby appears by and through its undersigned counsel pursuant to

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Section 1109(b) of the United States Bankruptcy Code, 11 U.S.C. §§ 101 - 1532 (the “Bankruptcy Code”), and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). Pursuant to Bankruptcy Rule 2002(g), Apex hereby requests that copies of all notices and pleadings given or filed in the above-captioned cases be given and served upon the following counsel at the following addresses, telephone numbers and email addresses:

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New York, NY 10036-8704
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Facsimile: (212) 596-9090
gregg.galardi@ropesgray.com
kimberly.kodis@ropesgray.com
sam.ashuraey@ropesgray.com

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, this request includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, whether transmitted or conveyed by regular mail, electronic mail, delivery service or some other means, or otherwise filed or made with regard to these Cases and proceedings therein. Further, this request includes copies of any disclosure statements to be submitted prior to approval and any and all plans of reorganization.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance shall not constitute a submission by Apex to the jurisdiction of the Bankruptcy Court. This Notice of Appearance and any subsequent appearance, pleading, claim or suit is not intended nor shall be deemed to waive any of Apex’s substantive or procedural rights, including: (i) the right to have final orders in non-core matters entered only after de novo review by a district court judge; (ii) the right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto;

(iii) the right to have the reference withdrawn by the United States District Court for this district in any matter subject to mandatory or discretionary withdrawal or the right to seek abstention in favor of any state court; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Apex is or may be entitled to under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved. Nor shall this request for notice be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules or Federal Rules of Civil Procedure.

Dated: October 17, 2018
New York, New York

APEX TOOL GROUP, LLC

/s/ Gregg M. Galardi

Gregg M. Galardi
Kimberly J. Kodis
Sam N. Ashuraey
ROPES & GRAY LLP
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